



Privacy Impact Assessment (PIA)  

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Farm Program Conservation System (FPAC)

FPAC Qualtrics (FPAC\_Qualtrics)

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## Document Information

Information Owner Contact Information	
Name	Kenneth Hill, Director, PAR and Risk Officer
Contact Number	(202) 772-6035
E-mail Address	<a href="mailto:kenneth.hill@usda.gov">kenneth.hill@usda.gov</a>

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Reviewer	Title	Date	Update: Y/N	If systemic, please provide comments
Laurie Snow	Information Systems Owner	10/8/2020		

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## Purpose of Document

USDA DM 3515-002 states: “Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews...” and “New systems, systems under development, or systems undergoing major modifications are required to complete a PIA.”

This document is being completed in accordance with NIST SP 800-37 Rev 1 which states, “The security plan also contains as supporting appendices or as references to appropriate sources, other risk and security-related documents such as a risk assessment, privacy impact assessment, system interconnection agreements, contingency plan, security configurations, configuration management plan, incident response plan, and continuous monitoring strategy.”

## Abstract

**Name of the component and system:** FPAC Qualtrics / Qualtrics Experience Management

**Brief description of the system and its function:** Qualtrics XM Software is externally hosted and provides the Farm Production and Conservation Business Center (FBC) with the tools needed to conduct secure online surveys. The Farm Service Agency and the Natural Resources Conservation Service within the FBC mission area are designated as High Impact Service Providers (HISP) by the Office of Management and Budget (OMB) and are required to collect and publish the results of this feedback quarterly. This software provides the ability to create, implement, manage, analyze and report web-based surveys and to upload mailed survey data to meet the requirement.

Why the PIA is being conducted: To support federal law, regulations and policies.

## Overview

- **System Name:** FPAC Qualtrics / Qualtrics Experience Management
- **System Description:** Qualtrics XM Software is externally hosted by Qualtrics and is available through the USDA SSO through a web browser. This software provides the FBC with the tools needed to conduct secure online surveys and combine the data with digitized mailed responses for a complete analysis. The Farm Service Agency and the Natural Resources Conservation Service within the FBC mission area are designated as High Impact Service Providers (HISP) by the Office of Management and Budget (OMB) and are required to collect and publish the results of customer feedback quarterly. This software provides the ability to create, implement, manage, analyze and report web-based surveys and to upload mailed survey data to meet the requirement.

Overview	
<p>The Customer Experience Division (CXD) within FBC manages the collection and reporting of customer experience feedback to measure, identify problem areas and improve our services. To meet HISP reporting requirements, CXD conducts annual and ongoing surveys distributed through hyperlinks either posted on the web, or distributed via email, to collect this feedback. CXD may also work with developers to conduct usability testing with volunteer customers. All surveys measuring the customer experience are managed by the CXD using the Qualtrics XM Platform which provides users with the ability to securely distribute and collect survey information.</p> <p>These surveys may include a limited amount of PII such as an email address and contact information used to deliver the survey. Some questions also collect information on age, race or ethnicity to analyze the satisfaction of specific population segments. In addition, individuals may inadvertently provide PII in their open text responses. All data collected is anonymized, removing contact information fields from the datafile, and analyzed within the system for reporting. Text responses are categorized by topic and sentiment and are not used verbatim, except to illustrate an example when appropriate. CXD licensed staff are the only users will access to the data and information.</p> <p>Qualtrics XM Platform is a cloud-based survey tool which is FedRamp Authorized.</p>	

## System Information

System Information	
Agency:	Farm Program Conservation System (FPAC)
System Name (Acronym):	FPAC Qualtrics (FPAC_Qualtrics)
System Type:	<input type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input checked="" type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Who owns this system? (Name, agency, contact information)	Laurie Snow USDA Headquarters 1400 Independence Avenue Washington DC (202) 260-8178 <a href="mailto:Laurie.Snow@usda.gov">Laurie.Snow@usda.gov</a>
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information Systems Security Program Manager (ISSPM) USDA/ FPAC-ISD-IAB-CS 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 <a href="mailto:Brian.Davies@usda.gov">Brian.Davies@usda.gov</a>

## Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule or technology being developed.

### 1.1 What information is collected, used, disseminated or maintained in the system?

**Information is collected, used, disseminated or maintained in the system.**

The FPAC FBC uses surveys to collect information meant to measure FBC’s customer experiences. All surveys are managed by the Customer Experience Division (CXD) which provides users with the ability to securely distribute and collect survey information. These surveys may include a limited amount of PII such as an email address and contact information used to deliver the survey. Some questions also collect information on age, race or ethnicity to analyze the satisfaction of specific population segments. In addition, individuals may inadvertently provide PII in their open text responses

### 1.2 What are the sources of the information in the system?

**Sources of information in the system.**

The source of the information is individual respondents and their data is collected via the cloud. Information in FPAC Qualtrics may be entered manually by authorized users/responders. For surveys that are distributed via email or require authentication, the authorized USDA Office survey Coordinator uploads or builds an invitation list in the survey software, which may contain PII (e.g. names and email addresses of survey recipients). Information may also be directly collected from individual respondents participating in the anonymous survey. Links to surveys can be published to both farmers.gov and may also be distributed by email or mail to survey respondents. Limited PII may be collected (such as names) as well as non-sensitive data and work-related contact information (e.g., work email address, work telephone number).

### 1.3 Why is the information being collected, used, disseminated or maintained?

**Why information being collected, used, disseminated or maintained.**

The USDA Farm Service Agency (FSA) and the Natural Resources Conservation Service (NRCS) within the FBC mission area are designated as High Impact Service Providers (HISP) by the Office of Management and Budget (OMB) and are required to collect and publish the results of this feedback quarterly.

### 1.4 How is the information collected?

**How information collected.**

To meet HISP reporting requirements, CXD conducts annual and ongoing surveys distributed through hyperlinks either posted on the web, or distributed via email, to collect this feedback. Surveys are usually submitted online by the customer within a web browser, with optional SMS surveys and offline methods available for mail recipients, smartphones or tablets. Respondents submit data using HTTPS (TLSv1.2 with AES 128/256 depending on the browser) to the front-end web server (typically customername.qualtrics.com). All data in

transit (respondent data to the cloud and the data from the cloud to CXD) is encrypted via TLSv1.2.

**1.5 How will the information be checked for accuracy?**

**How information is checked for accuracy.**

Data collected from the customer is required by USDA policy to be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made.

All data collected is anonymized, removing contact information fields from the datafile, and analyzed within the system for reporting. Text responses are categorized by topic and sentiment and are not used verbatim, except to illustrate an example when appropriate. CXD licensed staff are the only users with access to the data and information.

**1.6 What specific legal authorities, arrangements and/or agreements defined the collection of information?**

**Legal authority to collect information.**

**Reference Type:**

Statute 44 USC §3501 et seq. (1980)

Paperwork Reduction Act (PRA)

**1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.**

**Privacy risks and how mitigated.**

The controls that have been implemented, inherited, compensated, tested, satisfied and continuously monitored.

## Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

### 2.1 Describe all the uses of information.

**Uses of information.**

FPAC Qualtrics provides the USDA FBC with the tools needed to conduct secure online surveys and combine the data with digitized mailed responses for a complete analysis.

### 2.2 What types of tools are used to analyze data and what type of data may be produced?

**Tools used to analyze data and what type of data produced.**

No additional “tools” (other than the application and database itself) are used to analyze the data.

### 2.3 If the system uses commercial or publicly available data please explain why and how it is used.

**Why and how commercial or publicly available data is used.**

All surveys measuring the customer experience are managed by the CXD using the Qualtrics XM Platform which provides users with the ability to securely distribute and collect survey information. These surveys may include a limited amount of PII such as an email address and contact information used to deliver the survey. Some questions also collect information on age, race or ethnicity to analyze the satisfaction of specific population segments. In addition, individuals may inadvertently provide PII in their open text responses. Volunteer customers may provide contact information to participate in usability customer feedback measurement or volunteer programs within FPAC.

### 2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

**Controls in place to ensure information is handled in accordance with the above described uses.**

Access to the system and data are determined by business need and individual roles. Controls are in place to provide reasonable assurance that data integrity and confidentiality are maintained during processing. Controls in place to ensure the correct handling of information include the following:

End users are correctly identified and authenticated according USDA and FPAC 1) security policies for access managements, authentication and identification controls, 2) Audit logging is used to ensure data integrity.



## Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

### 3.1 How long is information retained?

<b>Time information is retained?</b>
The information is retained indefinitely (permanent records).

### 3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

<b>Retention period approved by component records officer and National Archives and Records Administration (NARA)?</b>
Yes, in accordance with USDA Directive DR 3080-001: Appendix A: Scheduling Records.

### 3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

<b>Risks associated with the length of time data is retained and how those risks are mitigated.</b>
<p>The retention period is based on a combination business need (i.e., how long do we need this information for our business process) and long-term usefulness. When records have reached their retention period, they are immediately retired or destroyed in accordance with the USDA Record Retention policies and procedures. During this period, the stored information may be at risk for viewing by unauthorized parties, data loss or destruction and non-availability. Access to computerized files are protected by access control software, physical access controls and if warranted, password-protected.</p> <p>SORN USDA/FPAC-2 States: Program documents are destroyed within 6 years after end of participation. However, FPAC is under a records freeze.</p> <p>According to Records Management DR3080-001 Disposition of Inactive Records: Records and other documents that are no longer sufficiently active to warrant retention in office space shall be removed as rapidly as possible by: (a) transfer to a Federal Records Center, or (b) transfer to a records retention facility meeting the requirements of 36 CFR Chapter 12, Subchapter B Records Management, Subpart K, 1228.224 through 1228.244, or (c) if authorized, by disposal. (See Appendix B – Records Disposition Procedures.)</p>

## Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

- 4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?**

**Internal organization(s) in which information is shared, what information is shared and for what purpose?**

N/A

- 4.2 How is the information transmitted or disclosed?**

**Information transmittal / disclosure.**

N/A

- 4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.**

**Privacy risks associated with the sharing and how they were mitigated.**

N/A

## Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

**5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?**

**External organization(s) is the information shared, what information is shared, and for what purpose?**

N/A No application information is being shared outside of the USDA environment.

**5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.**

**External PII sharing compatibility and SORN coverage, or legal mechanisms by which system is allowed to share PII.**

N/A

**5.3 How is the information shared outside the Department and what security measures safeguard its transmission?**

**Externally shared information and security measures.**

N/A

**5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.**

**External sharing privacy risks and mitigation.**

N/A

## Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information and the right to decline to provide information.

**6.1 Was notice provided to the individual prior to collection of information?**

**Individual notice prior to collection of PII information.**

Yes

**6.2 Do individuals have the opportunity and/or right to decline to provide information?**

**Individual's right to decline to provide PII information?**

Yes. FSA Privacy Policy states that "Submitting information is strictly voluntary."

**6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?**

**Individual's right to consent to uses of PII and how exercised.**

Yes, in accordance with FSA Privacy policy and the individual's written consent.

**6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.**

**Notice to individuals and unawareness risk mitigation.**

The risk is considered moderate. Notification is automatically provided in the system of records notice (Federal Register publication): SORN: USDA/FSA-2 - Farm Records File (Automated) and USDA/FSA-14 - Applicant/Borrower.

## Section 7.0 Access, Redress and Correction

The following questions are directed at an individual’s ability to ensure the accuracy of the information collected about them.

### 7.1 What are the procedures that allow individuals to gain access to their information?

**Individuals access to PII procedures.**

As published in SORN USDA/FSA-2 and SORN USDA/FSA-14: “An individual may obtain information about a record in the system which pertains to such individual by submitting a written request to the above listed System Manager. The envelope and letter should be marked “Privacy Act Request.” A request for information should contain: Name, address, ZIP code, name of the system of records, year of records in question, and any other pertinent information to help identify the file.”

### 7.2 What are the procedures for correcting inaccurate or erroneous information?

**Correction of erroneous information procedures.**

As published in SORN USDA/FSA-2 and SORN USDA/FSA-14: “Individuals desiring to contest or amend information maintained in the system should direct their request to the above listed System Manager, and should include the reason for contesting it and the proposed amendment to the information with supporting information to show how the record is inaccurate. A request for contesting records should contain: Name, address, ZIP code, name of the system of records, year of records in question, and any other pertinent information to help identify the file.”

### 7.3 How are individuals notified of the procedures for correcting their information?

**How individuals notified of correction procedures.**

Formal redress is provided via the FSA Privacy Act Operations Handbook.

### 7.4 If no formal redress is provided, what alternatives are available to the individual?

**Alternatives available to individual if no redress.**

N/A

### 7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

**Privacy risks associated with redress and risk mitigation.**

The risk associated with redress is considered low, as the public does not have access to the system or the data. While the public cannot access the system to update or change their personal information, they may update their information using from AD 2530 and submit to the appropriate FSA official. The FSA official will in turn update the system based on the information provided. There is work going on for Customer Self Service which will be public facing. SCIMS is no longer the source of entry since Business Partner was implemented in December 2014.

## Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

### 8.1 What procedures are in place to determine which users may access the system and are they documented?

**Access procedures and documentation.**

FSA-13-A is used to request user access to USDA and FPAC information technology systems including specifying authorization for accessing the system. (Refer to Notice IRM-440) In addition, access to FSA web applications is gained via an on-line registration process similar to using the FSA-13- A form. For system specific detailed access see SSP.

### 8.2 Will Department contractors have access to the system?

**Contractor access.**

Contractors collaborating with FPAC on specific projects for the USDA may have access to the system.

### 8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

**User privacy training.**

Once hired, privacy training, records management training, and security awareness training is completed prior to gaining access to a workstation. The privacy training addresses user’s responsibilities to protect privacy data and how to protect it.

### 8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

**Certification & Accreditation.**

Yes, the C&A process has been finalized and an ATO is anticipated in 2020.

### 8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

**Auditing measures and technical safeguards.**

Specific logging of transaction events (including who entered and when the transaction was completed along with type of financial transaction (such as loan activity, program payments, approvals, determinations, general or subsidiary ledger entries, etc.)); and application parameter/table changes (such as loan rates, penalties, etc.) occurs as part of the nightly process.

**8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?**

**Privacy risks identified and risk mitigation.**

The main risk associated with privacy is the exposure to unauthorized access to privacy information. This risk is considered moderate. Mitigating controls are in place to ensure privacy risks are minimal. Mitigated controls are mapped back to SSP in CSAM. Quarterly access reviews are done to ensure controls are mitigated.

## Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

### 9.1 What type of project is the program or system?

Project / System type.
Non-Major Application

### 9.2 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

Technology privacy risks.
No



## Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

- 10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 “Guidance for Online Use of Web Measurement and Customization Technology” and M-10-23 “Guidance for Agency Use of Third-Party Websites and Applications”?**

**SO and/or ISSPM review of Web guidance.**

Yes, no 3rd party website (hosting) or 3rd party application is being used.

- 10.2 What is the specific purpose of the agency’s use of 3rd party websites and/or applications?**

**Purpose of 3<sup>rd</sup>-party websites and/or applications?**

N/A

- 10.3 What personally identifiable information (PII) will become available through the agency’s use of 3rd party websites and/or applications.**

**PII availability through 3<sup>rd</sup>-party websites and/or applications.**

N/A

- 10.4 How will the PII that becomes available through the agency’s use of 3rd party websites and/or applications be used?**

**Use of PII available through 3rd party websites and/or applications.**

N/A

- 10.5 How will the PII that becomes available through the agency’s use of 3rd party websites and/or applications be maintained and secured?**

**Maintenance and security of PII available through 3rd party websites and/or applications.**

N/A

- 10.6 Is the PII that becomes available through the agency’s use of 3rd party websites and/or applications purged periodically?**

**Periodic purging of PII available through 3rd party websites and/or applications.**

N/A

- 10.7 Who will have access to PII that becomes available through the agency’s use of 3rd party websites and/or applications?**

**Access to PII available through 3rd party websites and/or applications.**

N/A

- 10.8 With whom will the PII that becomes available through the agency’s use of 3rd party websites and/or applications be shared - either internally or externally?**

**Internal / external sharing of PII available through 3rd party websites and/or applications.**

N/A

**10.9 Will the activities involving the PII that becomes available through the agency’s use of 3rd party websites and/or applications require either the creation or modification of a system of records notice (SORN)?**

**SORN requirements for sharing of PII available through 3rd party websites and/or applications.**

N/A

**10.10 Does the system use web measurement and customization technology?**

**Web measurement and customization technology.**

N/A

**10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?**

**User rights for web measurement and customization technology.**

N/A

**10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency’s use of 3rd party websites and/or applications, discuss the privacy risks identified and how they were mitigated.**

**3rd party websites and/or applications privacy risks and mitigation.**

N/A

# Appendix A. Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the FPAC Qualtrics (FPAC\_Qualtrics).

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Laurie Snow  
FPAC\_Qualtrics Information System Owner

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Date

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Brian Davies  
Information Systems Security Program Manager

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Date

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Amber Ross  
FPAC Privacy Officer

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Date